

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

ADVANCED PLASMONICS, INC.,

*Plaintiff,*

v.

UHANDER, INC.,

*Defendant.*

Case No. 6:23-cv-00008-RP

**JOINT MOTION FOR ENTRY OF SCHEDULING ORDER**

TO THE HONORABLE JUDGE ROBERT PITMAN:

Plaintiff Advanced Plasmonics, Inc. and Defendant Uhnder, Inc. have conferred about the schedule for the above-referenced case and as reflected in the attached proposed schedule have reached agreement except for with respect to the date on which fact discovery should open (which entry in the attached proposed schedule has been left blank for the Court to complete):

- a. Plaintiff's position: fact discovery should commence on **June 23, 2023**, the same day as Rule 26 initial disclosures are due.
- b. Defendant's position: fact discovery should commence on **1 business day after the claim construction hearing**, because (1) this date is consistent with Judge Albright's April 4, 2023 Standing Order Governing Proceedings (OGP) 4.3—Patent Cases, which is instructive; and (2) Defendant believes that claim construction may help to narrow or resolve this case, eliminating the need for or streamlining the discovery process.

Respectfully submitted,

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/s/ Wasif H. Qureshi

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*Counsel for Defendant Uhnder, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 2, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system under the Court's local rules.

/s/ Wasif H. Qureshi

Wasif H. Qureshi